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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Washington Utilities and Transportation Commission)
)
Petition for Delegation of Additional Authority) CC Docket No. 96-98
to Implement Number Conservation Measures) File No. NSD-L-99-102

SPRINT CORPORATION MOTION TO ACCEPT LATE FILED COMMENTS

Sprint Corporation ("Sprint") respectfully requests that the Commission accept its comments even though they were filed one day late.

Comments in response to the Washington Commission's petition were due yesterday, on February 28, 2000 (*see* DA 00-155). Sprint timely served a copy of its comments on parties by sending them *via* first class mail on February 28, 2000. However, due to an oversight by the courier service, hand delivery to the Commission Secretary, Commission staff members, and ITS was not completed on February 28, 2000 as represented by the certificate of service.

Sprint respectfully requests that the Commission accept these late filed comments and incorporate them into aforementioned docket as Sprint believes that no party will be prejudiced by the one day delay in service to the Commission and ITS.

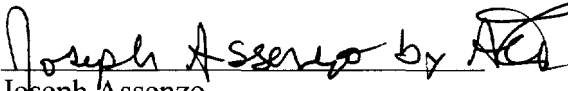
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To help ensure that the petitioner is not prejudiced by this one day delay in filing, Sprint has today faxed a copy of its comments and this motion to the Washington Commission.

Respectfully submitted,

SPRINT CORPORATION

By: 
Joseph Assenzo
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816-559-2614

February 29, 2000

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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Petition for Delegation of Additional Authority)	CC Docket No. 96-98
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SPRINT CORPORATION COMMENTS

Sprint Corporation, on behalf of its local, long distance, and PCS divisions (collectively, "Sprint"), submits these comments in response to the petition filed by the Washington Utilities and Transportation Commission ("WUTC") for delegation of additional authority to implement various number conservation measures.¹

For the most part, the number conservation additional authority that the WUTC seeks similar is to the authority that the Commission has delegated to other states. Sprint does not oppose this portion of the WUTC's petition. However, Sprint wholeheartedly agrees with the WUTC that "numbering administration and policy are appropriately addressed at the national level,"² and it encourages the Commission to complete its *Number Optimization Rulemaking* expeditiously.³ With the proliferation of states receiving

¹ See *Public Notice*, "Common Carrier Seeks Comment on the Washington Utilities and Transportation Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures," NSD File No. L-99-102, DA 00-155 (Jan. 31, 2000).

² WUTC Petition at 3.

³ See *Numbering Resource Optimization*, CC Docket No. 99-200, *Notice of Proposed Rulemaking*, FCC 99-122, 14 FCC Rcd 10322 (1999).

delegated conservation authority, Sprint carriers increasingly find themselves facing different and incompatible requirements in different states.

For example, an increasing number of states with delegated authority have imposed utilization and forecast requirements — yet each state has imposed reports with somewhat different data (or different definitions) and in different formats. Similarly, states are also understandably imposing requirements for carriers to obtain additional NXX codes — yet the requirements in one state are often different than those imposed in another state. These incompatible requirements are beginning to become an administrative nightmare and to impose noticeable cost inefficiencies — especially for carriers like Sprint that perform numbering functions on a regional or national basis in order to achieve cost efficiencies. This Commission can eliminate this growing cost inefficiency by adopting national standards that will apply throughout the country.

Sprint is compelled, however, to oppose the WUTC's request for authority to implement interim unassigned number porting ("UNP").⁴ Seven states before the WUTC have requested authority to engage in interim UNP, and in each instance the Commission denied the request.⁵ The Commission declined to delegate authority to implement interim UNP because:

- UNP is not competitively neutral;
- UNP is currently at too early a stage of development to order implementation;

⁴ The WUTC seeks UNP authority "*until* TNP [thousands block number pooling] or individual telephone number pooling are implemented." WUTC Petition at 9 (emphasis added).

⁵ See *New Hampshire Delegation Order*, NSD File No. L-99-71, at ¶ 36 (Nov. 30, 1999); *Wisconsin Delegation Order*, NSD File No. L-99-84, at ¶ 26 (Nov. 30, 1999); *Texas Delegation Order*, NSD File No. L-99-55, ¶ 30 (Nov. 30, 1999); *Maine Delegation Order*, NSD File No. L-99-27, ¶¶ 17 and 25 (Sept. 27, 1999); *Massachusetts Delegation Order*, NSD File No. L-99-19, ¶ 43 (Sept. 15, 1999); *New York Delegation Order*, NSD File No. L-99-21, ¶¶ 36-37 (Sept. 15, 1999); *Florida Delegation Order*, NSD File No. L-99-33, ¶¶ 41-42 (Sept. 15, 1999);

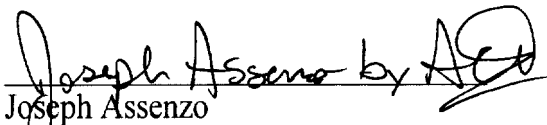
- UNP disrupts the ability of carriers to control their own inventories of numbers if their inventory can be accessed by other carriers (and often, their competitors);
- UNP could disrupt the routing of E911 emergency calls;
- UNP can pose problems for carriers switches; and
- Interim UNP would divert resources from implementation of thousands block number pooling.⁶

In making its interim UNP request, the WUTC has not even attempted to demonstrate that these Commission determinations are factually erroneous.

In summary, with the exception of interim UNP, Sprint supports the number conservation delegation petition that the WUTC has filed. While the Commission should expeditiously grant the WTUC petition (other than the UNP request), it should also expeditiously complete the *Number Optimization Rulemaking*. Indeed, prompt resolution of this *Rulemaking* would obviate the need for the WUTC to commence a new number conservation proceeding, only to commence yet another proceeding to adjust whatever rules it adopts to the national rules that the Commission ultimately promulgates. Everyone — state commissions and carriers — would benefit by expeditious adoption of national numbering conservation measures.

Respectfully submitted,

SPRINT CORPORATION

By: 
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February 28, 2000

⁶ See *Maine Delegation Order* at ¶ 25.

Certificate of Service

Anthony Traini certifies that he caused to be served the foregoing Sprint Corporation Comments *via* first-class mail this 28th day of February 2000 (with hand delivery to the persons designated by an asterisk).

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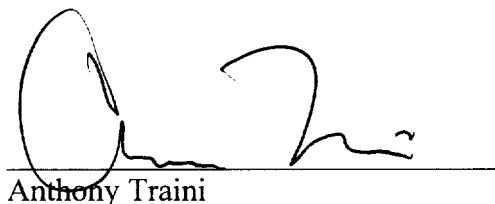
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